

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR 18-2945 WJ

LEVEILLE, et al.,

Defendants.

**UNOPPOSED MOTION FOR LEAVE TO FILE SURREPLY TO UNITED STATES’
OMNIBUS MOTION**

Defendant Subhanah Wahhaj, by and through undersigned counsel Ryan J. Villa and Justine Fox-Young, joined by all Defendants, moves the Court to enter an order for leave to file a Surreply to the United States’ Omnibus Motion *In Limine* to Exclude Defense Arguments and Evidence [Doc. 897] with a deadline of September 8, 2023. As grounds Ms. Wahhaj states:

1. On July 31, 2023, the United States filed its Omnibus Motion *In Limine* to Exclude Defense Arguments and Evidence. *See* Motion [Doc. 897].
2. On August 18, 2023, Defendants filed their Response to the United States Omnibus Motion. *See* Response [Doc. 938].
3. On August 25, 2023, the United States filed its Reply to Defendants Response to the Omnibus Motion. *See* [Doc. 943].
4. Defendants respectfully requests the Court enter an order allowing them to file a Surreply to the United States Reply in order to address several cases that the United States did not raise in their original motion.
5. Accordingly, Counsel is requesting a deadline of September 8, 2023 to file their Surreply.

6. The undersigned counsel has contacted counsel for the United States, AUSA Tavo Hall, regarding this Motion. Mr. Hall has indicated that the United States does not oppose this Motion.

WHEREFORE, Counsel respectfully requests this Court enter an Order for leave to file their Surreply as indicated above with a deadline of September 8, 2023.

Respectfully submitted,

/s/ Ryan J. Villa

Ryan J. Villa

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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2023, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa

RYAN J. VILLA